

**Robinson+Cole**

## Data Privacy + Cybersecurity Insider

Leveraging Knowledge to Manage Your Data Risks



### CYBERSECURITY

#### **[Connecticut Insurance Department Issues Bulletin on Data Security Requirements](#)**

We previously outlined the requirements of the Connecticut data breach law when it was amended in 2015, including the requirement to implement a comprehensive information security program (CISP).

The law requires that Third Party Administrators (TPAs) and Pharmacy Benefit Managers (PBMs) must implement a CISP by October 1, 2017, and certify to the Connecticut Insurance Department that they maintain a CISP in compliance with the statute.

The Connecticut Insurance Department has issued a Bulletin ([MC-23](#)) reminding those entities that fall under the law (including TPAs and PBMs) that they must have the CISP in place by October 1, 2017, and certify that it is in place using the certification attached to the Bulletin.

The October 1 deadline is approaching, so if you are a TPA or PBM, implementation of your CISP is a high priority.

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#### **[Siemens Medical Equipment Vulnerable to Cyber-Attacks](#)**

The Department of Homeland Security and Siemens Healthineers have identified cyber vulnerabilities in the Windows 7-based versions of Siemens PET/CT systems, SPECT systems, SPECT/CT Systems, and SPECT Workplaces/Symbia.net and has [issued a warning](#) concerning the vulnerabilities. [Read more](#)

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#### **[Nevada Implements Law That Requires Notice for Collection of Personal Information](#)**

Nevada has become the third state in the Union to adopt a law that requires operators of websites and online services to provide notice to consumers who are Nevada residents of their practices concerning the collection and sharing of personal information, including

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consumers' names, addresses, email addresses, telephone numbers, Social Security numbers, or identifiers that can be used to contact the person physically or electronically. [Read more](#)

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## **ENFORCEMENT + LITIGATION**

### **[DOJ Announces Project Focused on Admissibility of Forensic Evidence](#)**

Recently, the U.S. Department of Justice (DOJ) [announced](#) an initiative aimed at “examining and strengthening forensic science.” Presumably, the initiative will affect how the DOJ approaches digital forensic evidence in criminal prosecutions.

Deputy Attorney General Rod J. Rosenstein made the announcement at the International Association for Identification’s (IAI) Conference in Atlanta, Georgia. The IAI has a standing committee devoted to digital evidence. [Read more](#)

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## **DRONES**

### **[U.S. Army Issues Memorandum Banning Use of DJI Products Due to Cybersecurity Issues](#)**

Last week, the U.S. Army issued a memorandum discontinuing the use of DJI drone products due to cybersecurity concerns. The memorandum said, “Due to increased awareness of cyber vulnerabilities associated with DJI products, it is directed that the U.S. Army halt use of all DJI products. This guidance applies to all DJI brand unmanned aerial systems (UAS or drones) and any system that employs DJI electrical components or software including, but not limited to, flight computers, cameras, radios, batteries, speed controllers, GPS units, handheld control stations, or devices with DJI software applications installed.” Not long before this ban, the U.S. banned the use of closed circuit television (CCTV) cameras on critical infrastructure if the CCTV was manufactured in China. [Read more](#)

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## **HIPAA**

### **[What is the HIPAA Complaint Process?](#)**

The U.S. Department of Health and Human Services Office for Civil Rights (OCR) is responsible for enforcing the HIPAA Privacy and Security Rules. Any person who believes that a covered entity or business associate is not complying with HIPAA may file a complaint with OCR (complaints may also be submitted directly to a covered entity). Here is a high-level overview of the OCR complaint process from intake and review through investigation and resolution. [Read](#)

[more](#)

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## PRIVACY TIP #100

### Scary Statistics on Identity Theft of Children

It is one thing to steal our identity as an adult, but children are defenseless against this type of fraud. According to Experian, it handles 25,000 to 30,000 cases of identity theft and fraud every year and a whopping 17 percent affected children. The estimate is that it will affect up to 25 percent of children before they reach the age of 18. That is a disturbing statistic.

According to Michael Bruemmer of Experian, children can be targeted at birth when parents apply for Social Security numbers at the hospital, and children are vulnerable because most don't have a credit file and aren't checking their credit report.

Warning signs for parents to pay attention to include:

- If a child receiving a credit card offer in the mail that wasn't requested
- If you receive an IRS notice of delinquent taxes in the child's name
- If you receive collection calls regarding unpaid bills for products or services

Tips for parents to use on protecting their children's identity include:

- Teach your children not to give their personal information to anyone.
- Monitor and teach your children the importance of being careful about sharing their personal information online or on social media sites.
- Get a copy of your child's credit report and monitor your child's credit like you monitor your own.
- Push back on people and don't allow your child's Social Security number or other personal information to be shared with anyone who doesn't have a need to have it (even if there is a blank on the form asking for a SSN, ask why and refuse to give it).
- Teach your children the importance of their SSN and personal information and how to keep it safe.

Help your children combat identity theft and protect them from being one of the 25 percent who will be victims before they are 18.



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